

**Dragon, Karen E.**

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**From:** Szalajda, Jonathan V.  
**Sent:** Wednesday, July 27, 2005 11:29 AM  
**To:** NIOSH Docket Office  
**Cc:** Bergman, Michael S.; Cloonan, Terrence K.  
**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Karen / Diane -- please include this email with comments transmitted for docket -052. If you receive any electronic transmissions, I would appreciate it if you could send me a copy in advance of putting them in the docket folder.

Thanks, Jon

-----Original Message-----

**From:** Bergman, Michael S.  
**Sent:** Thursday, July 21, 2005 1:45 PM  
**To:** Szalajda, Jonathan V.  
**Cc:** Cloonan, Terrence K.  
**Subject:** RE: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Jon,  
Here is a docket comment on the APR guidance document that came in through Bill Haskell. Are you able to submit it to the docket?

Thanks,  
Mike

-----Original Message-----

**From:** Haskell, William  
**Sent:** Thursday, July 21, 2005 1:32 PM  
**To:** Bergman, Michael S.  
**Cc:** Haskell, William; leson@theiacp.org  
**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Mike,

Input on CBRN APR back from law enforcement contacts. Please handle as you see appropriate?

Bill H.

-----Original Message-----

**From:** Bruce Glasscock [mailto:[Bruceg@plano.gov](mailto:Bruceg@plano.gov)]  
**Sent:** Thursday, July 21, 2005 8:40 AM  
**To:** Haskell, William  
**Cc:** Joel Leson  
**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Bill in response to Joel's request I have asked my Public Safety staff to review the material. I have attached a response I have received thus far. I think it raises a significant issue in ensuring law enforcement executives fully understand the responsibilities they incur when acquiring breathing devices for their personnel. My experience indicates that while fire

7/28/2005

personnel are fully aware of the additional requirements, police have not dealt in this area to any great detail.

Training and education will be critical for law enforcement in this area.

## *Bruce*

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**From:** Ron Timmons  
**Sent:** Wednesday, July 20, 2005 22:19  
**To:** Bruce Glasscock  
**Subject:** RE: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Thank you for the opportunity to comment on the NIOSH Air-Purifying Respirators/Gas DRAFT FOR DISCUSSION.

While the original document is over 11,000 words, I highlighted about 900 of those I feel are most noteworthy (attached) for police departments anticipating their operational needs while using the equipment. I do not see anything within the draft document that police chiefs should comment on, especially since it appears less restrictive than OSHA and SARA Title III requirements, with I presume also exist as compliance mandates.

As is apparently throughout the document, the mere issuance of the equipment is just the start. Departments need to have a number of resources in place, including-

1. Instrumentation to determine oxygen levels and presence and concentration of hazardous substances.
2. Training in recognition of environments immediately dangerous to life or health (IDLH).
3. Full equipment training to all users.
  - a. Fit Test
  - b. Odor thresholds must be known by wearer
4. Proper utilization of the equipment:
  - a. Canisters to remain sealed in original packaging until used
  - b. Shelf life restrictions honored (future funding liability)
  - c. Canister replaced after escape and reentry into hazardous environment
  - d. Occupational exposure limits tracking
  - e. Time tracking of canister use in hazardous environment "breakthrough time"
  - f. Accurate and reproducible calculations for canister change-out schedules
  - g. Contingency stock of unopened canisters = 2 per respirator
  - h. Parts inventory for worn or malfunctioning parts
  - i. Worn by clean shaved faces and reduced hairlines (off-duty responses, UC personnel?)

- j. "Ensure all your skin is covered" (Gloves, neck, sleeves, uniform shorts?)
- 5. Incident Command:
  - a. Cautions and limitations must be known and enforced
  - b. Two-man concept used
  - c. Common commands trained and utilized
  - d. Must be decontaminated upon exit
  - e. Decontamination run-off must be contained, drummed, and removed for proper disposal
  - f. Each respirator individually triple bagged after use

I believe each department will have to make a conscious decision to have a full support system in place prior to making the equipment available to their personnel. The simple assumption may be that issuance of the equipment and training is the whole story in providing the protection. However, a significant level of responsibility is assumed by the municipality in encouraging and allowing personnel to enter (or remain in) a hazardous environment. A case may be made for the equipment to be used for escape purposes only, and skirt some of these requirements (such as metering of the environment). But once the agency allows their personnel to remain in the hazard zone, expertise beyond the capabilities of many police departments will have to be sought from other sources.

While many police personnel have a depth of experience in the military and are familiar with military procedures and philosophies in the use of personal protective equipment, US citizens are guaranteed certain health protections, on par with personnel operating in hazardous waste disposal sites as their full time occupation. Jurisdictions intent on providing this equipment, especially with enabling homeland security funds, have a number of incident command considerations to face if they are to fully address moral and legal obligations to protect their personnel.

Ron Timmons

-----Original Message-----

**From:** Bruce Glasscock

**Sent:** Mon 7/18/2005 10:34 AM

**To:** Bill Peterson; Brian Collins; Bruce Glasscock; Cindy Potrykus; David Stephens; Greg Rushin; Ron Timmons; Susan Beckley Helt

**Cc:**

**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

FYI and comment

*Bruce*

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**From:** Joel Leson [mailto:leson@theiacp.org]

**Sent:** Monday, July 18, 2005 09:34

**To:** Al Broadbent; Betty Kelepecz; Bill Haskell; Bill Haskell (Alt); Bruce Glasscock; Bruce Marquis; Cameron Naron; Carl Milazzo; Cathy Lanier; Charles Ramsey; Dan Rosenblatt; David Mitchell; Dee Rivard (Asst to Sec Mitchell); Dennis Jenson; Donald Ryder; Douglas Davis; E. Ronald Frazier; Eugene Cromartie; Gary Wade; Gene Voegtlin; Gerald Galloway; Gregory Cooper; Harlin McEwen; James McMahon; James Rohan ; James Shamess; Joel Leson; John Chase; John Clark; John LeCours; John Miller; Joseph Samuels, Jr.; Kathleen Higgins; Kenneth Morckel; LaSean Young (Asst to CofS); Leonard Eric Patterson; Melvin Carraway; Michael Martin; Neil Gallagher; Patrick Sullivan; Peter Modafferi; Phil Keith; Richard Cashdollar; Richard Stanley; Robert Nichelini; Ronald Ruecker; Salvatore Baragiola;

Susan Riseling; W. Larry Ford; William Arrington; Willie Hulon

**Cc:** dmc bath@troopers.state.ny.us; Rickey.Ricks@ocfl.net; bbutle@co.arlington.va.us; czurn@ocsd.org; Matt Snyder

**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Homeland Security Committee (HSC) Members:

HSC member Bill Haskell has asked that I forward this information to you.

Please review or pass to the individual who deals with CBRNE/PPE subject matter for your agency.

As Bill points out, "Feedback from law enforcement professionals will help NIOSH greatly."

Although there are a number of police agencies that use self-contained breathing apparatus and should take a look at all three of the documents Bill has forwarded, I believe that we should concern ourselves with the Air-Purifying Respirators/Gas Masks discussed in the first draft of the three drafts.

We here at the IACP hope all is going well for everyone.

Best regards,

Joel

Joel L. Leson  
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Staff Liaison to the Homeland Security Committee  
International Association of Chiefs of Police  
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Alexandria, VA 22314-2357  
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-----Original Message-----

**From:** Haskell, William [mailto:cz8@cdc.gov]

**Sent:** Monday, July 18, 2005 7:54 AM

**To:** Joel Leson

**Cc:** jim.shameless@l-3com.com; Ramsey, Charles (MPD); kathleen.higgins@nist.gov; Haskell, William; tkennedy@ctc.org

**Subject:** FW: NIOSH Interim Guidance Documents for CBRN APR and SCBA - Posted on NIOSH Docket for Info & Comment

Dear Joel,

NIOSH - National Personal Protective Technology Laboratory (NPPTL) has posted three (3) draft CBRN respirator related guidance documents on our web site. Public comments can be submitted to the NIOSH Docket Office by 31 March, 2005.

Could you please forward this information to the IACP-HSC membership and also have IACP consider posting on their web site?

Feedback from law enforcement professionals will help NIOSH greatly. These documents will also be excellent training information for the law enforcement community.

The three (3) draft documents are:

- 1) Draft: Interim Guidance on the Use of Chemical, Biological, Radiological and Nuclear (CBRN) Full Facepiece, Air-Purifying Respirators/Gas Masks Certified Under 42 CFR Part 84
- 2) Draft: NIOSH-Approved CBRN SCBA User's Guide - Training Aid
- 3) Draft: Guide to the Technical Use of the Chemical, Biological, Radiological, and Nuclear (CBRN) Open Circuit, Pressure-Demand Self-Contained Breathing Apparatus (SCBA) Respirators Certified Under 42 CFR Part 84

Access to these documents can be found at:  
<http://www.cdc.gov/niosh/npptl/resources/certpgmspt/meetings/conceptGuid-071905.html>

Public comments regarding the draft guidance documents should be provided to the NIOSH Docket Office by August 31, 2005:

NIOSH Docket Office, Reference: NIOSH DOCKET -052  
 Robert A. Taft Laboratories, M/S C34  
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 Cincinnati, Ohio 45226  
 Telephone 513-533-8303,  
 Fax 513/533-8285  
 Email: [niocindocket@cdc.gov](mailto:niocindocket@cdc.gov)  
 Respectfully,  
 Bill Haskell, NIOSH-NPPTL